

Message

From: Gry Ahlefeld-Engel [/O=TOLDSKAT/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BF08BE88C46F4231A8D5BC823CD20291-W24045]
Sent: 5/21/2019 7:45:37 PM
To: PFI002@politi.dk
CC: Steen Bechmann Jacobsen [steen.jacobsen@sktst.dk]
Subject: Forligsaftalens parter
Attachments: Settlement Agreement Exhibits Draft- 5.14.19.docx

Kære Per,

Herved først og fremmest listen over samtlige de parter, der er omfattet af vores forligsaftale. Det er et udkast, men jeg forventer ikke, listen ændrer sig. Jeg afventer stadig at få den endelig godkendelse fra forligsparterne på, at jeg må oversende selve aftaleteksten. Jeg håber på, den kommer i morgen.

Det er formentlig unødvendigt at nævne, men materialet skal holdes i en meget snæver kreds, da Skattestyrelsen ifalder ansvar, hvis listen løkkedes.

//Gry

Venlig hilsen

Gry Ahlefeld-Engel

Underdirektør

Kompleks Svig

+45 72 37 36 62

Gry.Ahlefeld-Engel@SKTST.DK



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 Kratbjerg 236, Fredensborg
www.sktst.dk

Skattestyrelsen er en del af Skatteforvaltningen

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Sent: Tue 5/21/2019 7:45:37 PM (UTC)
To: PFI002@politi.dk[PFI002@politi.dk]
Cc: Steen Bechmann Jacobsen[Steen.Jacobsen@SKTST.DK]
Subject: The parties to the settlement agreement
Attachments: Settlement Agreement Exhibits Draft- 5.14.19.docx

Dear Per,

Herewith first and foremost is the list of all the parties covered by our settlement agreement. It is a draft, but I don't expect the list to change. I am still waiting for final approval from the settlement parties for me to send the text of the agreement itself. I hope to have it tomorrow.

It probably doesn't need to be mentioned, but the material must be kept in a very narrow circle, as the Danish Tax Agency is subject to liability if the list is leaked.

//Gry

Best regards

Gry Ahlefeld-Engel

Deputy Director
Complex Fraud

+45 72 37 36 62

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The Danish Tax Agency
Kratbjerg 236, Fredensborg
www.sktst.dk

The Danish Tax Agency is a part of the Danish Tax Administration

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FOR SETTLEMENT PURPOSES ONLY
WLRK DRAFT: MAY 14, 2019, at 11 p.m.

□
Exhibits to Settlement Agreement

Exhibit 1: Covered Parties

Exhibit 1A: Fully released Pension Plans, pension plan partnerships and partners

Exhibit 1B: Fully released individuals

Exhibit 1C: Partially released individual

Exhibit 2: Pension Plans, pension plan partnerships and partners, in which both a Covered Party and one or more other persons or entities who are not Covered Parties have an interest

Exhibit 3: Non-exhaustive list of parties excluded from release

Exhibit 3A: Non-exhaustive list of pension plans excluded from release

Exhibit 3B: Non-exhaustive list of individuals excluded from release

Exhibit 3C: Non-exhaustive list of other entities excluded from release

Exhibit 4: Affidavit of Confession of Judgment

Exhibit 5: Updated Affidavit of Confession of Judgment

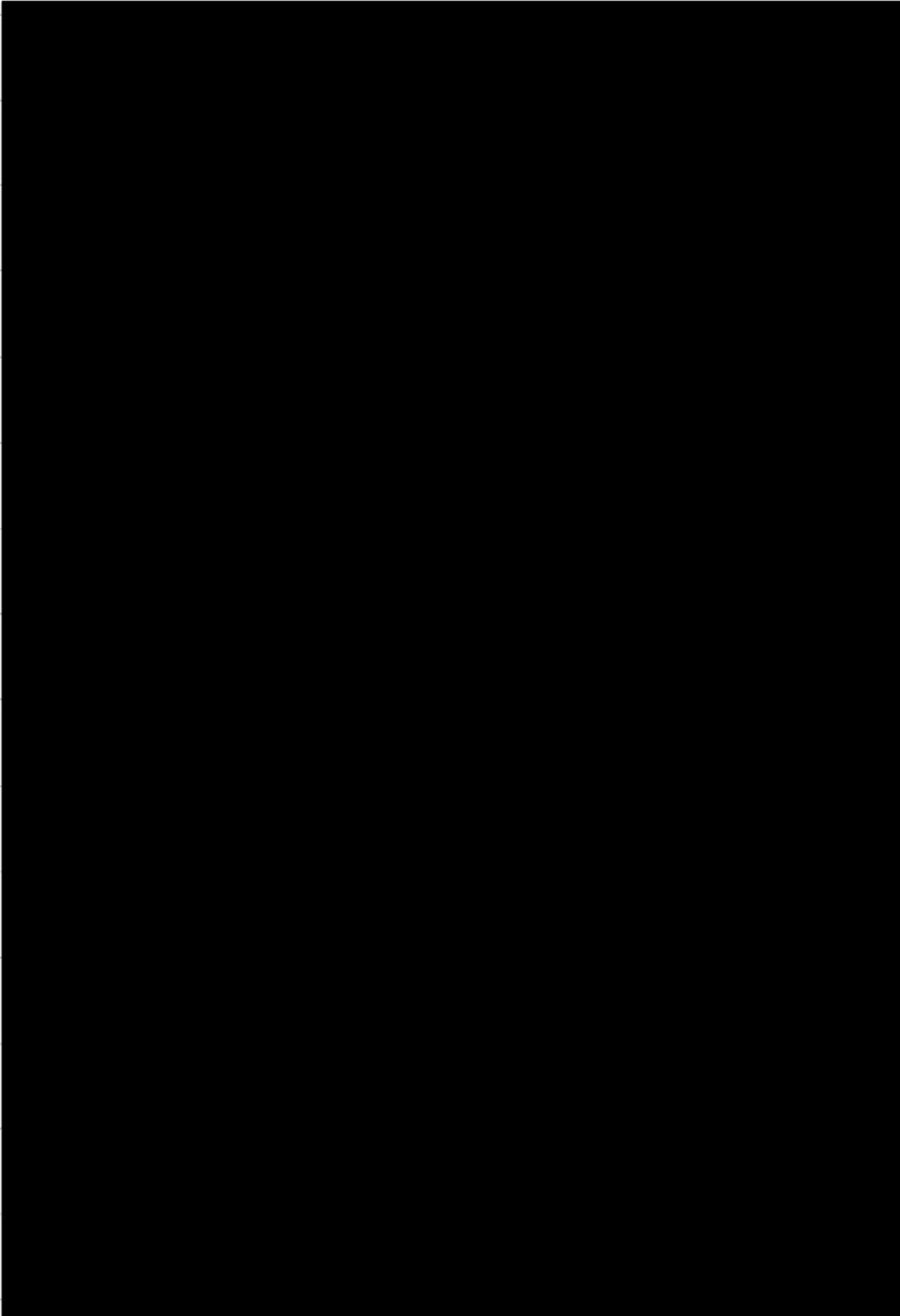
Exhibit 1: Covered Parties**Exhibit 1A: Fully released Pension Plans, pension plan partnerships and partners**

	Pension Plans	Partnerships	Partners
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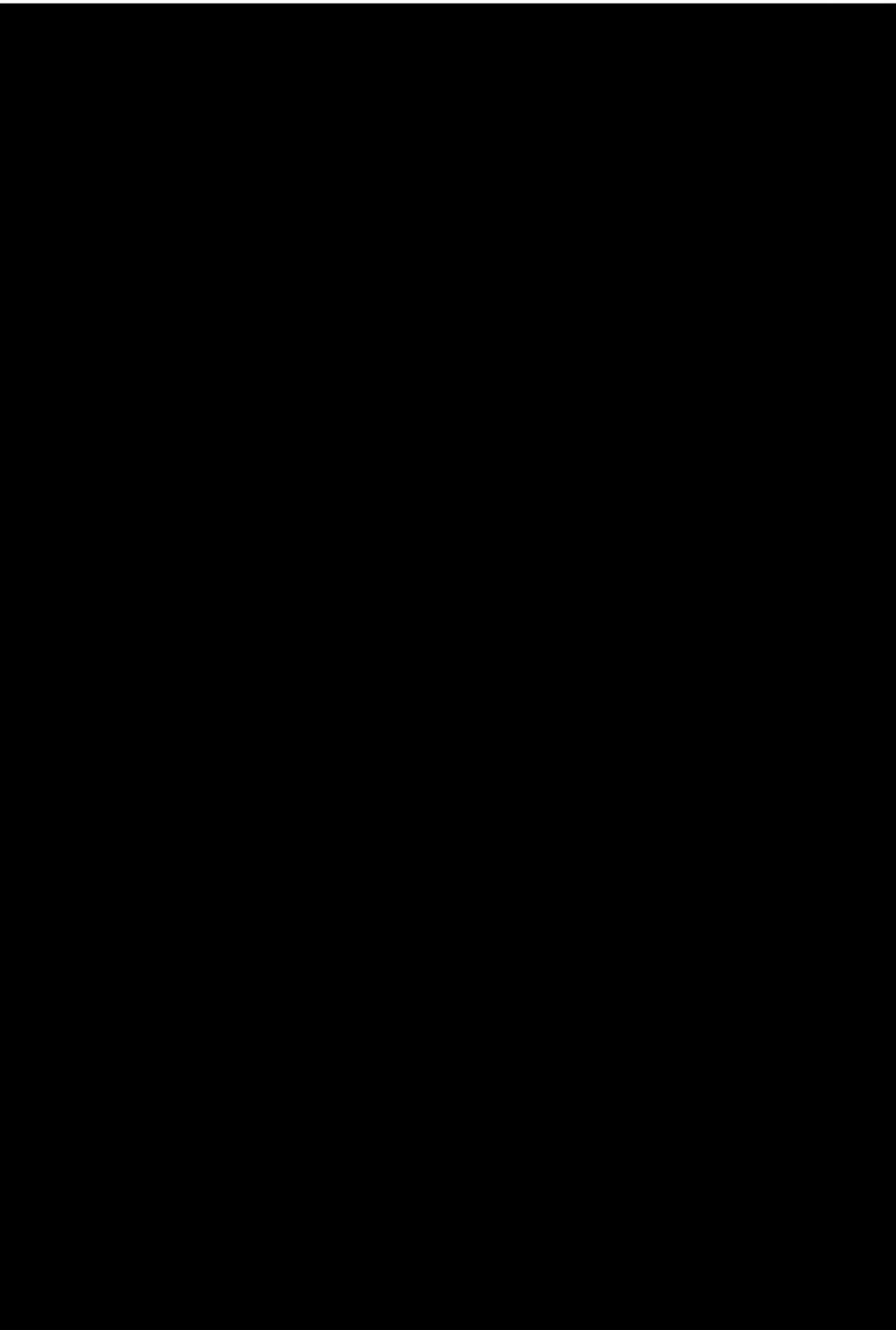
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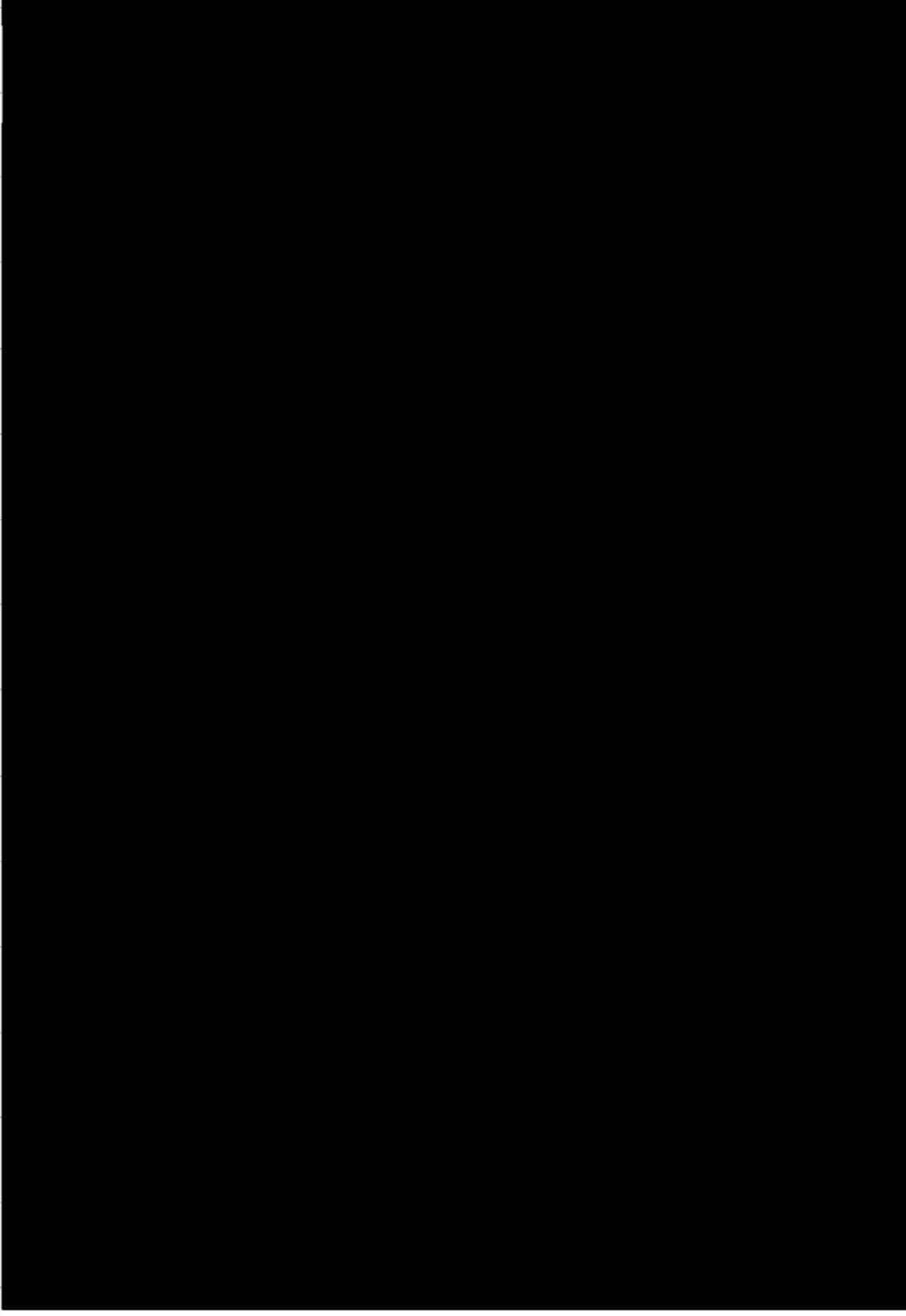
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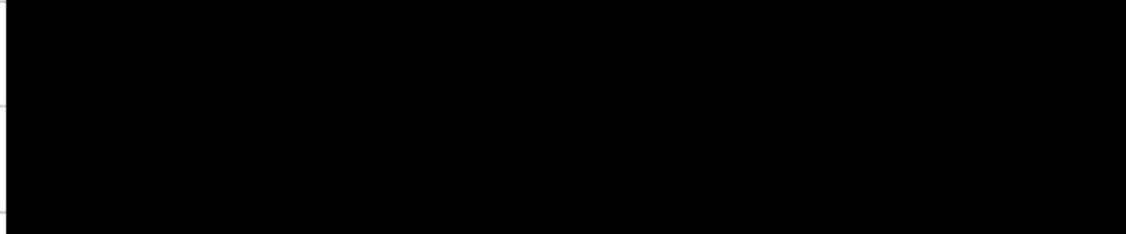
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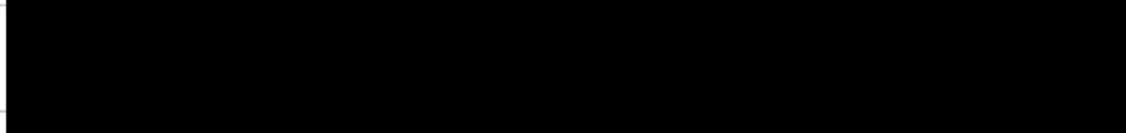
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Exhibit 1B: Fully released individuals

	Individuals
1.	[REDACTED]
2.	[REDACTED]
3.	[REDACTED]
4.	[REDACTED]
5.	[REDACTED]
6.	[REDACTED]
7.	[REDACTED]
8.	[REDACTED]
9.	[REDACTED]
10.	[REDACTED]
11.	[REDACTED]
12.	[REDACTED]
13.	[REDACTED]
14.	[REDACTED]
15.	[REDACTED]
16.	[REDACTED]
17.	[REDACTED]
18.	[REDACTED]
19.	[REDACTED]
20.	[REDACTED]
21.	[REDACTED]
22.	[REDACTED]
23.	[REDACTED]
24.	[REDACTED]
25.	[REDACTED]
26.	[REDACTED]
27.	[REDACTED]
28.	Lhote, Jerome [REDACTED]
29.	[REDACTED]
30.	McGee, Luke [REDACTED]
31.	[REDACTED]
32.	[REDACTED]
33.	[REDACTED]
34.	[REDACTED]
35.	[REDACTED]
36.	[REDACTED]
37.	[REDACTED]
38.	[REDACTED]

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46.	Stein, Matthew
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Exhibit 1C: Partially released individual

The following individual is partially released, only for his interest in parties listed on Exhibit 2.



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Exhibit 2: Pension Plans, pension plan partnerships and partners, in which both a Covered Party and one or more other persons or entities who are not Covered Parties have an interest

	Pension Plans	Partnerships	Partners*
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
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10.			

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*In all partnerships in which [REDACTED] were partners, [REDACTED] were also partners. [REDACTED] [REDACTED] are not included on this list because no Covered Party has an interest in either of those two plans and those two plans are not released.

Exhibit 3: Non-exhaustive list of parties excluded from release**Exhibit 3A: Non-exhaustive list of pension plans excluded from release**

Pension Plans	
1	Albedo Management LLC Roth 401(K) Plan
2	Avanix Management LLC Roth 401(K)
3	Azalea Pension Plan
4	Ballast Ventures LLC Roth 401(K) Plan
5	Bareroot Capital Investments LLC Roth 401(K) Plan
6	Basalt Ventures LLC Roth 401(K) Plan
7	Batavia Capital Pension Plan
8	Battu Holdings LLC Roth 401(K) Plan
9	Bernina Pension Plan
10	Calypso Investments Pension Plan
11	Cantata Industries LLC Roth 401(K) Plan
12	Cavus Systems LLC Roth 401(K) Plan
13	Cedar Hill Capital Investments LLC Roth 401(K) Plan
14	Crucible Ventures LLC Roth 401(K) Plan
15	Dicot Technologies LLC Roth 401(K) Plan
16	Eclouge Industry LLC Roth 401(K) Plan
17	Fairlie Investments LLC Roth 401(K) Plan
18	First Ascent Worldwide LLC Roth 401(K) Plan
19	Fulcrum Productions LLC Roth 401(K) Plan
20	Green Scale Management LLC Roth 401(K) Plan
21	Hadron Industries LLC Roth 401(K) Plan
22	Keystone Technologies LLC Roth 401(K) Plan
23	Limelight Global Productions LLC Roth 401(K) Plan
24	Loggerhead Services LLC Roth 401(K) Plan
25	Monomer Industries LLC Roth 401(K) Plan
26	Omineca Pension Plan
27	PAB Facilities Global LLC Roth 401(K) Plan
28	Pinax Holdings LLC Roth 401(K) Plan
29	Plumrose Industries LLC Roth 401(K) Plan
30	RJM Capital LLC Pension Plan
31	Roadcraft Technologies LLC Roth 401(K) Plan
32	Routt Capital Pension Plan
33	Starfish Capital Management LLC Roth 401(K)Plan
34	Sternway Logistics LLC Roth 401(K) Plan
35	Tarvos Pension Plan
36	Trailing Edge Productions LLC Roth 401(K) Plan

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37	True Wind Investments LLC Roth 401(K) Plan
38	Tumba Systems LLC Roth 401(K) Plan
39	Voojo Productions LLC Roth 401(K) Plan

Exhibit 3B: Non-exhaustive list of individuals excluded from release

	Individuals
1	[REDACTED]
2	Ben-Jacob, Michael
3	Burns, Alexander
4	Altbach, Ronald
5	Herman, Joseph
6	[REDACTED]
7	Jones, Robin
8	Lerner, Perry
9	Markowitz, Jocelyn
10	Markowitz, Richard
11	Van Merkensteijn, Elizabeth
12	Van Merkensteijn, John
13	Zelman, David

Exhibit 3C: Non-exhaustive list of other entities excluded from release

	Entity
1	[REDACTED]
2	[REDACTED]
3	[REDACTED]

Skatteforvaltningen expressly reserves all rights to pursue all persons and entities for all claims that are not released pursuant to this Settlement Agreement, including but not limited to all claims against defendants that Skatteforvaltningen has sued in the United States, the United Kingdom, Denmark, Dubai, Malaysia, or any other jurisdiction.